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RESPONDENT

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)

IN RE: JOSEPH P. MCKIM	
LENA M. ASSETTO MCKIM	CHAPTER 13
DEBTOR(S)	CASE NUMBER: 15-11490-ELF
MTGLQ INVESTORS, L.P.	
V.	
JOSEPH P. MCKIM	
LENA M. ASSETTO MCKIM DEBTOR(S)	
WILLIAM C. MILLER, TRUSTEE	

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

MTGLQ INVESTORS, L.P. has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362(d) in order to proceed with its rights under non-bankruptcy law with regard to the Property, located at 110 Hawthorne Road, Coatesville, PA 19320.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **February 15, 2017**, you or your attorney must do all of the following:
 - (a) file an answer explaining your position with the Clerk's Office located at:

Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

In Philadelphia: In Reading:

900 Market Street, Suite 400 400 Washington Street

Philadelphia, PA 10107 4200

The Medison Rapiding, Suite

Philadelphia, PA 19107-4299 The Madison Building, Suite 300

Reading, PA 19601

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If you mail your answer to the Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

William E. Miller, Esq. Stern & Eisenberg, PC 1581 Main Street, Suite 200 The Shops at Valley Square Warrington, PA 18976 Telephone: (215) 572-8111 Facsimile: (215) 572-5025 wmiller@sterneisenberg.com

and to the Trustee:

William C. Miller Ch. 13 Trustee 1234 Market Street Suite 1813 Philadelphia, PA 19107

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in this motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on February 21, 2017 at 9:30 am in Courtroom 1, United States Bankruptcy Court, Robert N.C. Fix Sr. Federal Courthouse, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

STERN & EISENBERG, PC

By: /s/ William E. Miller, Esq. William E. Miller, Esq., 1581 Main Street, Suite 200 The Shops at Valley Square Warrington, PA 18976 Phone: (215) 572-8111

Fax: (215) 572-5025 Bar Number: 308951

Email: wmiller@sterneisenberg.com

Date: January 30, 2017